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February 26, 2020

Hon. Vincent L. Briccetti
United States District Court Judge
United States District Court, Southern District of New York
300 Quarropas Street, Room 630
White Plains, NY 10601

Re: *Marlaina Koller-Gurgigno v. City of Yonkers, et al.*
U.S. District Court, Southern District of New York
Index No.: 7:18 Civ. 00098 (VB)

Dear Judge Briccetti:

Our law firm represents the plaintiff Marlaina Koller in the captioned matter. I write pursuant to Your Honor's Individual Practices to request an adjournment of the case management conference presently scheduled for February 28, 2020 at 9:30 am. Since the last case management conference in this case, the parties have been engaged in settlement discussions, and plaintiff has stipulated to discontinue this action as to the following defendants: The City of Yonkers Police Department; Police Officer Remy Susini (#293); Police Officer Romano (#995); Lieutenant Geleski; Anna Gurgigno and Vincent Gurgigno, Sr. (Docket # 57). The parties are currently discussing the scheduling of mediation with respect to the remaining defendants.

All parties consent to this adjournment request and propose the following dates for the rescheduling of the conference: the morning of Monday, March 16 or anytime on Tuesday, March 17 or Friday, March 20. This is the first request for an adjournment of this conference. The reason for the adjournment request is that a medical procedure has been scheduled on that day for an immediate family member of mine. Additionally, my colleague, Justin M. Gardner, who has been working with me on this case, is now also unavailable to appear for this conference because he is scheduled to take a deposition that day in a CERCLA case pending in the U.S. District Court, E.D.N.Y. (*State v. Pride Solvents & Chem. Co., et al*, 15-CV-6569). Mr. Gardner is unable to reschedule this deposition because, pursuant to the case management order in that case, fact discovery must be completed by that date.

Thank you for Your Honor's consideration of our request for a brief adjournment of the February 28, 2020 conference.

Very truly yours,



John P. Hannigan

cc: All Counsel (Via ECF)